



JOINT MANAGEMENT PLAN REVIEW

Scoping Comments: Ecosystem Protection – Benthic Habitats

Scoping Comments Received Regarding Fisheries and Bottom Trawling

- Fisheries are currently being micro managed, and regulation has increased, while practices have remained the same.
- Concerned about declining fish populations. Sanctuary should play a role in preserving fish populations, while preserving fishery lifestyles.
- Existing DFG/NMFS rules on by catch are wasteful. Sanctuary & Fisherman could work together on this.
- Trawling alters Benthic organisms and bottom habitats, causes displacement of rocks that serve as cover for fish and invertebrates, disruption of bottom affects species diversity, abundance, and distribution.
- The Sanctuary should not regulate fishing.
- The current language in the Federal Register with relation to fisheries regulation in the Sanctuary should remain.
- The knowledge of members of the fishing industry should be utilized for data collection and research purposes, as well as for environmental monitoring. (All)
- The Sanctuary should explore fisheries regulation only in offshore federal waters, not State waters. Existing agencies do a better job, and more regulation is not necessary.
- Sanctuary should assist CDFG with enforcement, but should not create new regulations.
- The Sanctuary should restrict trawling.
- Any fishing regulations that are developed should support the fishing community.
- Any zones or regulations proposed by the Sanctuary which affect fishing should only occur if they are the result of a cooperative effort with the fishing and or aquaculture communities and they have the support of those communities.
- Sanctuary should not regulate fisheries in state waters.
- Clarify language about fishing.
- Sanctuary should play an education role rather than regulatory role with commercial fishing.
- The Sanctuary should not regulate fisheries, with the exception of trawling.
- Sanctuary should not allow trawling. It caused significant degradation of seafloor.
- Do not become another layer of bureaucracy in dealing with fishing and dredging.
- Fishing in the Sanctuary should be limited to techniques that do not produce by-catch, as do gill nets and bottom trawling.

- The Sanctuary should endorse commercial fisheries within its boundaries.
- The Sanctuary should ban all forms of net fishing.
- Sanctuaries should require low impact gear for bottom trawling.
- The Sanctuary should not regulate fishing. Language in the management plan should clarify that.
- Fishing gear should be examined for problems: non-degradable, entanglement. Sanctuary should look for ways to partner with existing agencies to address issue.
- Look to other regions with fisheries collapsing and learn.
- Sanctuary could work with PFMC using existing regulatory structures.
- Recognize in writing that Sanctuary policies affecting fishing may integrate with management tools promulgated by the state and federal governments, but are not intended to augment or supersede them. (All)
- MBNMS with California Department of Fish and Game, the National Marine Fisheries Service, the research community, fishermen and other stakeholders should 1) evaluate physical and biological impacts of bottom trawling within the Sanctuary and 2) ensure protection of species diversity, abundance and habitat. In working with CDFG and NMFS the Sanctuary and its sister agencies should consider gear selectivity if adverse effects of bottom trawling are identified.
- Concerned about impacts to the seafloor from dredging and disposal and continued bottom trawling. (MB)

Scoping Comments Received Regarding Ecosystem Conservation

- The less than one percent of the Sanctuary that is currently fully protected, is insufficient to fulfill the Sanctuary's mandate of maintaining its natural biological communities and protecting, restoring, and enhancing its natural habitats, populations, and ecological processes.
- Need more conservation in general.
- Goal of MBNMS should be to protect and preserve.
- It is much better economically (and easier) to save species and ecosystems before they become endangered or compromised in some way. Protection now makes the most long-term sense.
- Concerned about loss of species biodiversity and abundance, impacts to habitat, impacts to predator/prey interactions.
- Any proposals to make multiple use equivalent to resource protection, to have a separate category of "minimal use", to exempt certain areas from jurisdiction, etc. should be viewed with caution.
- There should be one management plan for each ecosystem, not one management plan per agency. This public thinks of ecosystems as one, not as six agencies with varying degrees of management responsibility.
- Management should strive for long-term sustainable use
- The Sanctuary needs to find the right balance between use and protection.
- More protection is needed in general for the ecosystem and biodiversity.
- Resource protection should be the main priority.

- Strengthen resource protection; do not allow local control to undermine this.
- Expand sanctuary concept to unify and make consistent resource protection, for better management of resources.
- Sanctuary should look at the big picture of overall environmental impacts, and manage the resources appropriately.
- Sanctuaries should ensure comprehensive coverage with overlapping jurisdiction, to improve resource protection.
- Use of precautionary principle for protection of natural phenomenon.
- We urge the National Marine Sanctuary Program to ensure that any issues considered during JMPR process be considered in the context of the National Marine Sanctuaries Act's primary goal of resource protection. We strongly advocate for the adoption and enforcement of strong policies and regulations that provide maximum protection of Sanctuary resources.
- Strengthen the Sanctuary's Program of resource protection through zonal management, an important tool in achieving long-term sustainability of our large-scale coastal ecosystem.
- The revised management plans should be designed to help recover species that are most at risk and should reflect a precautionary approach to resource management to avoid future species declines.
- Revised management plans should contain directives and timelines for developing specific action plans focused on protecting, and where necessary, restoring, natural habitats, populations, and ecological processes. Plans should also contain specific directives and management measures on certain issues.
- Think as long term as possible. This plan is designed to last 5 or 10 years, but maybe we also need to identify issues that are considered 50 or 100-year issues.
- Remember to think and plan as systemically as possible, not just about distinct and separate issues, but about all the connections and boundaries and overlaps: coastlines and jurisdictions and regions and ecosystems and partnerships and nexuses and all those connections.

Sanctuary Advisory Council Comments on the Effects of Trawling on Benthic Habitats

- Evaluate effects of bottom trawling on benthic habitat and consider further restrictions on trawling. The adverse impacts of bottom trawling are well documented (NRC Report, 2002). An assessment of the impacts of bottom trawling on MBNMS resources is needed. The MBNMS should work with other relevant agencies to adopt appropriate regulations or zones to protect benthic habitats from bottom trawling.
- We need to set strict standards on seafloor alteration, especially bottom trawling and fiber optic cables - public opposes these.